

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE  
2015 JAN 12 PM 4 49  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

**FILED UNDER SEAL**

UNITED STATES OF AMERICA )

v. )

DZHOKHAR TSARNAEV )

CRIMINAL NO. 13-10200-GAO

**SEALED MOTION FOR LEAVE TO FILE REPLY UNDER SEAL**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves for leave to file a reply to the Government's Opposition ("Govt. Opp.") [DE \_\_ (under seal), filed Jan. 4, 2015] to Defendant's Motion to Limit Disclosure of Foreign Defense Witnesses. [DE \_\_ (sealed), filed on Dec. 29, 2014] and to do so under seal.

As grounds therefor, defendant states that a reply will provide an opportunity to respond to matters first raised in the government's opposition and to assist the Court in adjudicating the motion by narrowing and focusing the issues.

The reply should be filed under seal because prior filings in connection with this motion have been made under seal due to the sensitive subject matter of the motion and to ensure the safety of defense team members who will be traveling in foreign countries referenced in the motion.

Respectfully submitted,

DZHOKHAR TSARNAEV  
by his attorneys



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**Certificate of Service**

I hereby certify that this document has been served upon counsel for the United States by e-mail PDF this 12th day of January, 2015.



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